Message

From: Crawford, Dorothy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22442C0DAD249C1B798271CB981B12F-CRAWFORD, DOROTHY]

Sent: 3/15/2018 1:39:06 PM

To: Baca, Michael, NMENV [michael.baca1@state.nm.us]

CC: Bates, Rita, NMENV [Rita.Bates@state.nm.us]; Verhalen, Frances [verhalen.frances@epa.gov]; Intermont, Donna,

NMENV [Donna.Intermont1@state.nm.us]; Singleton, Kerwin, NMENV [Kerwin.Singleton@state.nm.us];

judy.fisher@state.nm.us; mary.hilbert@state.nm.us

Subject: PM10 Exceedance, Chaparral site, 4/8/15, 35-013-0020-81102-1, 191 ug/m3

Attachments: 08apr15 Initial Notification R6 comments.docx; 08apr15 Summary R6 comments.docx

Mike, Thanks for the draft Initial Notification. It was good to speak with you yesterday.

When applicable, the formal Initial Notification should be sent to the EPA Region 6 Regional Administrator Anne Idsal, with email copy to Fran and me. The formal Initial Notification letter is between our senior managers and can be narrow in scope. To date, most Initial Notification letters are one page in length. Suggest the letter include the information in table A (date, event type, site ID, site name, parameter/pollutant, exceedance concentration). The regulatory significance of the exceedance can be mentioned or summarized in the letter. The nuances and details of Design Value calculations and how the exceedance impacts the Design Value can be a topic of our discussions before and after the letter submittal.

It would be helpful if we continued to communicate (e.g., email, conf calls) both before and after the Initial Notification letter about the exceedance(s) and the regulatory significance of each exceedance. To save both our resources, we hope to forestall the submittal of a formal Initial Notification if after discussions we agree there is no regulatory significance to the specific exceedance, at this time. In the case of the 2015, 2016, and 2017 PM10 exceedance at various monitors in Dona Ana County, it is likely they will have regulatory significance given the total number in the 3 year period and how the PM10 Design Value is calculated but we need to review each exceedances on a specific monitor basis.

In our response to the Initial Notification letter, Region 6 will indicate the target due date for the Exceptional Event Demonstration submittal. If NMED has input to this date, we can discuss this informally or you can suggest a date in the letter.

I responded to the specific questions in the draft documents.

Look forward to working with you to define the scope of the work load facing us for all the 2015, 2016, and 2017 PM10 exceedances which have regulatory significance. A spreadsheet of all the exceedances would help us get organized and possibly plan an approach to the work. Be talking or emailing with you soon. Call if you have any questions,

Dorothy Crawford U.S. EPA, Region 6, Air Monitoring (214) 665-2771

From: Baca, Michael, NMENV [mailto:michael.baca1@state.nm.us]

Sent: Wednesday, March 14, 2018 12:58 PM

To: Crawford, Dorothy < Crawford. Dorothy@epa.gov>; Bates, Rita, NMENV < Rita. Bates@state.nm.us>; Verhalen, Frances < verhalen.frances@epa.gov>; Intermont, Donna, NMENV < Donna.Intermont1@state.nm.us>;

Singleton, Kerwin, NMENV < Kerwin. Singleton@state.nm.us >; judy. fisher@state.nm.us;

mary.hilbert@state.nm.us

Subject: NMED Exceptional Event Initial Notification Form

Good afternoon,

Please find a draft initial notification form and supporting data summary to be used to facilitate discussion about the process. I wanted to have feedback on these before proceeding with the rest of the dates for 2015 and 2016. I will speak to everyone shortly.

Thanks,

Mike Michael Baca NMED AQB 2301 Entrada del Sol Las Cruces, NM 88001 (575) 288-2050